

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

UNITED STATES OF AMERICA, v. BIJAN RAFIEKIAN and KAMIL EKIM ALPTEKIN, Defendants.	: : : : : : : : : : :	Criminal Case No. 1:18-CR-457 (AJT)
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DEFENDANT BIJAN RAFIEKIAN'S TRIAL EXHIBIT LIST

DEX	DATE	DOCUMENT
1.	07/29/2016	Email from B. Kian to M. Flynn, re: Ekim Alptekin
2.	09/01/2016	Email from J. Courtovich to B. Kian, cc'd to G. Miller, G. Lowman, and J. Kelly, re: FARA (attachment Kelner white paper <i>Have We Reached a FARA "Tipping Point?"</i>)
3.	09/01/2016	Email from B. Kian to R. Kelner, cc'd C. Pilgram, re: Scheduling a call
4.	09/03/2016	Email from B. Kian to M. Flynn, re: confidence
5.	09/03/2016	Email from B. Kian to M. Flynn, re: CONFIDENCE
6.	09/14/2016	Declassified Memo re September 14, 2016 Meeting with Michael Flynn
7.	09/16/2016	Email from B. Kian to R. Kelley, re: LDA form
8.	09/16/2016	Email from B. Kelley to B. Kian, re: LDA Steps
9.	09/18/2016	Email from B. Kian to E. Alptekin, re: Talking points
10.	09/21/2016	Email from C. Pilgram to B. Kelley, re: Friday 1030 Sept ??
11.	09/23/2016	Email from C. Pilgram to T. Newberry, E. Jensen Yokoi, B. Kian, A. Udvig, & M. Boston, re: RE: FIG Research Support Agreement

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12.	09/23/2016	Email from B. Kian to T. Newberry, E. Socolosky, A. Udvig, M. Flynn, M. Boston, & B. McCauley, re: Re: FIG Research Support Agreement
13.	09/26/2016	Email from G. Miller to B. Kelley, B. Kian, cc'd M. Boston, re: Connecting
14.	09/28/2016	Declassified Memo re September 28, 2016 Meeting with Bijan Kian
15.	09/30/2016	FIG Lobbying Registration LD-1 Disclosure Form
16.	09/30/2016	Email from R. Kelley to B. Kian, re: Farwell
17.	10/11/2016	Email from M. Boston to J. Graham, R. Kelley, cc'd B. Kian, re: Info on Client LDA reporting
18.	10/12/2016	Email from R. Kelley to M. Boston cc'd B. Kian, re: re
19.	10/14/2016	Email from Elliott Investigative Services to Brian McCauley, re: Quick Call
20.	10/19/2016	Email from C. Walling to G. Miller, re: Monopoly (attachment Mula Mullah Board)
21.	10/19/2016	Email from J. Courtovich to G. Miller, re: Board Game
22.	10/21/2016	Email from B. Kian to M. Boston, re: Updates (attachments Texas One Page, Gulen Briefing Sheet, Gulenopoly, Charter Schools and IRS, Mula Mullah Board)
23.	10/31/2016	Email from C. Walling to G. Miller, re: Gulenopoly (attachment Gulenopoly)
24.	10/31/2016	Email from M. Boston to B. McCauley, G. Miller, E. Jensen Yokoi, B. Kian, T. Newberry, & C. Pilgram, re: Project meeting Wednesday at noon our office suite (attachments FIG Presentation and Gulenopoly)
25.	11/05/2016	Statement of the Problem – Facts Bearing on the Problem of the Gulen Ecosystem
26.	11/05/2016	Email from B. Kian to M. Flynn and M. Boston, re: Working papers for your review

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27.	11/06/2016	Email from M. Ledeen to M. Flynn, re: Please Review draft OPED on Turkey
28.	11/09/2016	SGR LLC LDA Form
29.	11/12/2016	Email from B. Kian to M. Flynn Jr, cc'd M. Flynn re is this a problem??
30.	11/14/2016	Email from B. Kian to E. Alptekin, re: Corrected invoice
31.	11/18/2016	Email from B. Kian to J. Courtovich, cc'd G. Miller, re: ...the media storm
32.	11/18/2016	Email from J. Courtovich to B. Kian and G. Miller, re: General Flynn Clips
33.	11/18/2016	Email from B. Kian to J. Courtovich
34.	11/18/2016	Email from T. Spencer to W. Burck, B. Kian, and R. Kelley, re: Statement of Inovo (attachments: 18_NOV_2016 – Copy & Untitled attachment)
35.	11/18/2016	Email from W. Burck to T. Spencer, cc'd to B. Kian, and R. Kelley, re: Statement of Inovo
36.	11/22/2016	Email from B. Kian to G. Miller
37.	12/14/2016	Email from J. Courtovich to E. Alptekin, re: Follow-up
38.	12/22/2016	Email from B. Kian to B. Kian and zulutym@gmail.com, re: <i>No Subject</i>
39.	12/26/2016	Email from E. Alptekin to B. Kian, re: Article of General Flynn
40.	12/27/2016	Email from G. Miller to J. Courtovich, re: Time sensitive – FIG close out memo (attachment Engagement Summary and Notification of LDA Termination)
41.	01/09/2017	Letter from R. Kelner to M. Flynn, re engagement to represent Flynn Intel Group
42.	01/09/2017	Letter from R. Kelner to M. Flynn, re: engagement for FARA advice

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43.	01/09/2017	Email from J. Courtovich to B. Kian, re: Turkey FARA Breakdown
44.	01/22/2017	Email from J. Courtovich to E. Alptekin and cc'd to G. Miller, re: DRAFT Plan for Turkey (attachment Turkey Proposal)
45.	01/23/2017	Email from J. Courtovich to B. Kian, cc'd G. Miller, re: Just a heads up
46.	01/23/2017	Email from E. Alptekin to J. Courtovich, cc'd to G. Miller, re: Draft Plan for Turkey
47.	01/24/2017	Email from J. Courtovich to B. Kian, cc'd to G. Miller, re: TR
48.	01/24/2017	Email from J. Courtovich to E. Alptekin
49.	01/24/2017	Email from M. Nolan to E. Alptekin & S. Akyuz, re: FW: Inovo and FARA
50.	01/25/2017	Email from G. Miller to E. Alptekin and cc'd to J. Courtovich, re: Proposal (attachment Turkey Proposal)
51.	01/25/2017	Email from J. Courtovich to ttuncer@mfa.gov.tr and cc'd to G. Miller, re: Public Affairs Proposal (attachment Turkey Proposal)
52.	01/25/2017	Email from J. Courtovich to E. Alptekin, re: Skype call w/ Ekim Alptekin
53.	01/31/2017	Email C. Amindaray to G. Miller, re: Turkey Pitch Notes (attachment Turkey Pitch Notes)
54.	01/31/2017	Email from J. Courtovich to B. Kian, re: Meeting w/ Turkish DCM
55.	02/01/2017	Email from G. Miller to C. Amundaray and S. Looney, re: Turkey (attachment Turkey Proposal)
56.	02/06/2017	Email from J. Courtovich to G. Miller, re: Budget Proposal
57.	02/06/2017	Email from E. Alptekin to G. Miller, cc'd J. Courtovich, re: Re: Budget proposal
58.	02/07/2017	Email from J. Courtovich to B. Kian, cc'd to G. Miller

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59.	02/15/2017	Email from G. Miller to J. Courtovich, re: Timeline
60.	03/07/2017	Complete FIG FARA Filing
61.	03/09/2017	Email from J. Courtovich to E. Alptekin, cc'd B. Kian, re: Press
62.	06/14/2017	Video – FY 2018 State Department Budget Request, Opening Remarks Before the House Committee on Foreign Affairs, 115th Cong. (2017) (statement of Rex W. Tillerson, Secretary of state, on Muslim Brotherhood)
63.	10/27/2017	Declaration of R. Kelley
64.	06/13/2018	Letter from Robert Kelner & Stephen Anthony to James Gillis
65.	01/18/2019	FIG Certificate of Dissolution
66.	07/12/2019	Document Received from Government at July 12, 2019 Hearing
67.	07/13/2019	Fahrettin Altun AP Tweet
68.	-	RESERVED
69.	08/28/2015	August 28, 2015 Contract between Amsterdam & Partners LLP and Turkey
70.	10/26/2015	Amsterdam & Partners LLP, Exhibit A (Fara Reg. no. 6325)
71.	10/26/2015	Amsterdam & Partners LLP, Robert R. Amsterdam Short Form (Fara Reg. no. 6325)
72.	05/31/2016	Amsterdam & Partners LLP, Supplemental Statement (Fara Reg. no. 6325)
73.	05/31/2016	Amsterdam & Partners LLP, Andrew Durkovic Short-Form (Fara Reg. no. 6325)
74.	06/08/2016	Video – Robert Amsterdam Address to DHS Secretary Johnson over Fethullah Gülen
75.	08/19/2016	Video – After The Coup: Interview with lawyer Robert Amsterdam on Gulen's extradition

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76.	11/30/2016	Amsterdam & Partners LLP, Supplemental Statment (Fara Reg. no. 6325)
77.	2017	Empire of Deceit (PDF)
77A.	2017	Empire of Deceit (Book)
78.	06/01/2017	Amsterdam & Partners LLP, Supplemental Statment (Fara Reg. no. 6325)
79.	09/15/2017	Amsterdam & Partners LLP, Informational Materials – Billboard disclosure (Fara Reg. no. 6325)
80.	09/22/2017	Amsterdam & Partners LLP, Informational Materials – NYT Advertisement (Fara Reg. no. 6325)
81.	11/30/2018	Amsterdam & Partners LLP, Supplemental Statement (Fara Reg. no. 6325)
82.	05/29/2019	Amsterdam & Partners LLP, Supplemental Statement (Fara Reg. no. 6325)
83.	-	Empire of Deceit Website Hompage
84.	12/31/2015	Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938, as amended, for the six months ending December 31, 2015
85.	06/30/2016	Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938, as amended, for the six months ending June 30, 2016
86.	12/31/2016	Report of the Attorney General to the Congress of the United States on the Administration of the Foreign Agents Registration Act of 1938, as amended, for the six months ending December 31, 2016
87.	06/30/2017	Report of the Attorney General to the Congress of the United State on the Administration of the Foreign Agents Registration Act of 1938, as amended for the six months ending June 30, 2017

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88.	12/31/2017	Report of the Attorney General to the Congress of the United State on the Administration of the Foreign Agents Registration Act of 1938, as amended for the six months ending December 31, 2017
89.	-	Flynn Intel Group, Inc. - Bylaws

Dated: July 14, 2019

Respectfully submitted,

/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that, on the 14th day of July 2019, true and genuine copies of Defendant's Trial Exhibit List were sent via electronic mail by the Court's CM/ECF system to the following:

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